

## REMARKS/ARGUMENTS

In the Office Action mailed February 27, 2008, claims 11-24 were rejected. In response, Applicants hereby request reconsideration of the application in view of the proposed amendments and the below-provided remarks. No claims are canceled. Applicants submit that the proposed amendments place the present application in better condition for allowance or in better condition for appeal.

For reference, claim 11 is amended. In particular, claim 11 is amended to recite detection of a voltage or a current from the at least one substrate of the receiving substrate and the top/protective substrate, other than from a dedicated light sensor circuit component. This amendment clarifies that the receiving substrate and/or the top/protective substrate are capable of generating charge carriers even in the absence of specific light sensor circuit components such as transistors and photodiodes. This amendment is supported, for example, by the subject matter described at page 2, lines 12-17, of the present application.

Additionally, claims 25-28 are added. Claim 25 is directed to defining the receiving substrate as an integral, large-area light sensor to generate the charge carriers in the receiving substrate, and to clarify that the receiving substrate generates the charge carriers in response to the light incidence on any part of the receiving substrate. Claim 26 clarifies that the receiving substrate covers a majority of a surface area of the electronic memory component and that the receiving substrate generates the charge carriers in response to the light incidence on any part of the receiving substrate. Claims 27 and 28 are similar to claims 25 and 26, except claims 27 and 28 are directed to the top/protective substrate, rather than the receiving substrate. These amendments are supported, for example, by the subject matter described at page 2, lines 29-31, and page 5, line 32, through page 6, line 5, of the present application.

### Claim Rejections under 35 U.S.C. 103

Claims 11- 24 were rejected under 35 U.S.C. 103(a) as being unpatentable over Wong et al. (U.S. Pat. No. 6,026,017, hereinafter Wong) in view of Bretschneider et al. (U.S. Pat. Pub. No. 2002/0130248, hereinafter Bretschneider). However, Applicants

respectfully submit that these claims are patentable over Wong and Bretschneider for the reasons provided below.

#### Independent Claim 11

Claim 11 recites “a circuit arrangement in contact with at least one substrate of the receiving substrate and the top/protective substrate for detection of a voltage or a current from the at least one substrate of the receiving substrate and the top/protective substrate, other than from a dedicated light sensor circuit component, in response to generation of charge carriers in the at least one substrate upon light incidence on the electronic memory component” (emphasis added).

In contrast, the combination of Wong and Bretschneider does not teach generation of charge carriers in at least one substrate, other than from a dedicated light sensor circuit component. It should be noted that the Office Action recognizes that Wong does not teach a circuit arrangement in contact with at least one substrate of the receiving substrate and the top/protective substrate for detection of a voltage or a current in response to generation of charge carriers in at least one substrate upon light incidence on the electronic memory component. Hence, the Office Action relies on Bretschneider as purportedly teaching the indicated limitation.

Nevertheless, Bretschneider does not teach detecting a voltage or current from a substrate, other than from a dedicated light sensor circuit component, as recited in claim. Bretschneider merely describes using a specific circuit component—the bipolar transistor 12—to detect incident light. Bretschneider, paragraph 36. Bretschneider states that the optosensitive detector unit 10 utilizes the light-sensitive properties of semiconductor transistors because the PNP transistor supplies and amplification of the photo current. Bretschneider, paragraph 35. In other words, Bretschneider teaches using a specific circuit component, rather than using a substrate generally, to detect incident light. Additionally, Bretschneider describes using a combination of multiple detector units 10 on a smart card controller chip arrangement 200. Bretschneider, Figs. 4-7. However, the use of multiple detector units 10 does not negate the fact that Bretschneider merely describes using specific circuit components to detect incident light.

Since Bretschneider does not teach detection of a voltage or a current from a substrate, other than from a dedicated light sensor circuit component, as recited in claim, the combination of cited references does not teach all of the limitations of the claim. Accordingly, Applicants respectfully submit claim 11 is patentable over the cited references because the combination of cited references does not teach all of the limitations of the claim.

#### Dependent Claims

Claims 12-28 depend from and incorporate all of the limitations of the independent claim 11. Applicants respectfully assert claims 12-28 are allowable based on an allowable base claim. Additionally, each of claims 12-28 may be allowable for further reasons, as described below.

In regard to claims 25 and 27, Applicants respectfully submit that claims 25 and 27 are patentable over the combination of Wong and Bretschneider because the combination of cited references does not teach all of the limitations of the claims. Claim 25 recites “the receiving substrate comprises an integral, large-area light sensor to generate the charge carriers in the receiving substrate, wherein the receiving substrate is configured to generate the charge carriers in response to the light incidence on any part of the receiving substrate” (emphasis added). Claim 27 recites a similar limitation, although with reference to the top/protective substrate. In contrast, the combination of Wong and Bretschneider does not teach generating charge carriers in response to light incidence on any part of a substrate. As explained above, Bretschneider merely describes detecting incident light using specific, dedicated light sensors in the form of bipolar transistors. Hence, the description of bipolar transistors implemented as dedicated light sensors is insufficient to describe a substrate which is an integral, large-area light sensor to generate charge carriers in response to light incidence on any part of the substrate. Therefore, the combination of Wong and Bretschneider does not teach all of the limitations of the claim because Bretschneider does not teach a substrate which is an integral, large-area light sensor to generate charge carriers in response to light incidence on any part of the substrate. Accordingly, Applicants respectfully assert claims 25 and 27 are patentable

over the cited references because the combination of cited references does not teach all of the limitations of the claims.

In regard to claims 26 and 28, Applicants respectfully submit that claims 26 and 28 are patentable over the combination of Wong and Bretschneider because the combination of cited references does not teach all of the limitations of claims. Claim 26 recites “the receiving substrate covers a majority of a surface area of the electronic memory component, wherein the receiving substrate is configured to generate the charge carriers in response to the light incidence on any part of the receiving substrate” (emphasis added). Claim 28 recites a similar limitation, although with reference to the top/protective substrate. In contrast, the combination of Wong and Bretschneider does not teach generating charge carriers in response to light incidence on any part of a substrate. As explained above, Bretschneider merely describes detecting incident light using specific, dedicated light sensors in the form of bipolar transistors. Hence, the description of bipolar transistors implemented as dedicated light sensors is insufficient to describe a substrate which generates charge carriers in response to light incidence on any part of the substrate. Therefore, the combination of Wong and Bretschneider does not teach all of the limitations of the claim because Bretschneider does not teach a substrate which generates charge carriers in response to light incidence on any part of the substrate. Accordingly, Applicants respectfully assert claims 26 and 28 are patentable over the cited references because the combination of cited references does not teach all of the limitations of the claims.

## CONCLUSION

Applicants respectfully request reconsideration of the claims in view of the proposed amendments and the remarks made herein. A notice of allowance is earnestly solicited.

At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account **50-3444** pursuant to 37 C.F.R. 1.25. Additionally, please charge any fees to Deposit Account **50-3444** under 37 C.F.R. 1.16, 1.17, 1.19, 1.20 and 1.21.

Respectfully submitted,

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